

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

TIMOTHY WHITE,

Plaintiff,

v.

**REGIONAL ADJUSTMENT
BUREAU, INC. d/b/a RAB, INC.**

Defendant.

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CIVIL ACTION NO. 3:11-cv-01817-B

**TIMOTHY WHITE’S OBJECTIONS TO REGIONAL ADJUSTMENT BUREAU’S FIRST
AMENDED PRETRIAL DISCLOSURES**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff Timothy White (“Dr. White”) files these objections to the First Amended Pretrial Disclosure of Defendant Regional Adjustment Bureau, Inc. (“RAB”) and in support thereof would show the following:

RAB disclosed five employees “which may have knowledge regarding collection activity related to [Dr. White’s] account.” (Doc. 73 at 2). RAB did not provide the telephone number of any of these employee-witnesses and—for each employee-witness—RAB provided a collective Tennessee address. *See id.* Accordingly, it seems fair to compel RAB’s counsel to accept service of subpoenas on behalf of RAB’s employee-witnesses. Dr. White requests such an order.

Dr. White objects to RAB’s publishing to the jury or admitting into evidence any redacted documents as well as any that are incomplete (missing attachments, for example)—absent this Court’s *in camara* inspection to determine the subject-matter, nature, and propriety of such redactions or incompleteness. Dr. requests this simple order as well.

Dated: February 1, 2013.

Respectfully submitted,

By: /s/ Noah D. Radbil

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Attorneys for Plaintiff TIMOTHY WHITE

CERTIFICATE OF SERVICE

On February 1, 2013, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal rule of Civil Procedure 5 (b)(2).

By: /s/ Noah D. Radbil

Noah D. Radbil